

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAROL ROUGVIE, *et al.*,

Plaintiffs,

v.

ASCENA RETAIL GROUP, INC. d/b/a/
JUSTICE STORES

and

TWEENT BRANDS, INC. d/b/a
JUSTICE STORES

Defendants.

BARBARA COMLISH and KATHRYN
ARTLIP,

Objectors.

No. 2:15-cv-00724-MAK

DECLARATION OF ADAM SCHULMAN

**DECLARATION OF ADAM SCHULMAN
IN SUPPORT OF OBJECTION**

I, Adam Schulman, declare as follows:

1. I have personal knowledge of the facts set forth herein and, if called as a witness, could testify competently thereto.

2. I am an attorney with the non-profit Competitive Enterprise Institute (“CEI”), working at the Center for Class Action Fairness in CEI’s litigation branch. My business address is 1899 L Street, NW, 12th Floor, Washington, DC 20036. My phone number is (610) 457-0856.

3. I am a member of the bar of this Court. I represent class members Barbara Comlish and Kathryn Artlip in objecting to the proposed settlement, class certification and fee award.

4. On March 25, 2016 I contacted class counsel and defendants’ counsel via email asking them questions about claims data regarding this settlement and inquiring into the relationship between Caroline Mansour and the Messrs. Mansour serving as class counsel

5. On March 28, 2016, I received a response from William Pietragallo informing me that class counsel would provide class claims information on or shortly after the April 4 claims deadline. He also informed me that Caroline Mansour is related to Messrs. Mansour without specifying further.

6. Attached as Exhibit 1 to this Declaration is a true and correct copy of Mr. Pietragallo’s email of March 28.

7. On April 4, 2016, I received an email from Kevin Raphael containing relevant claims data as of April 1.

8. Attached as Exhibit 2 to this Declaration is a true and correct copy of Mr. Raphael’s email of April 4.

9. On April 13, 2016 (two days before the objection deadline), I received another email from Kevin Raphael containing updated claims data as of April 8 (four days after the claims deadline). This data is synthesized in Ms. Comlish and Ms. Artlip's Objection.

10. Attached as Exhibit 3 to this Declaration is a true and correct copy of Mr. Raphael's email of April 13.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April, 13, 2016, in Alexandria, VA.

A handwritten signature in black ink, appearing to read 'Adam Schulman', written in a cursive style.

Adam Schulman

CERTIFICATE OF SERVICE

I hereby certify that on this day I filed the foregoing with the Clerk of the Court via ECF thus effectuating service on all counsel who are registered as electronic filers in this case. Additionally, I served true and correct copies upon the following attorneys via U.S. mail at the addresses below:

PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP 1818 Market Street Suite 3402 Philadelphia, PA 19103	Gregory T. Parks MORGAN, LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103
MANSOUR GAVIN LPA 1001 Lakeside Avenue Suite 1400 Cleveland, Ohio 44114	

DATED: April 14, 2016

/s/ Adam E. Schulman
Adam E. Schulman